

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. 25-
v.	:	DATE FILED:
DEWHITE DAWKINS	:	VIOLATIONS:
a/k/a “Twin White”	:	18 U.S.C. § 371 (conspiracy to commit
a/k/a “Kaleem Fraites”	:	bribery – 1 count)
	:	18 U.S.C. § 201 (bribery – 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INFORMATION

COUNT ONE

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times relevant to this information:

1. Defendant DEWHITE DAWKINS resided in Philadelphia, in the Eastern District of Pennsylvania.
2. Defendant DEWHITE DAWKINS was involved in the possession and distribution of a controlled substance, that is, marijuana, in the Eastern District of Pennsylvania.
3. Tanya Whyte-Francis, charged elsewhere, was a United States Postal Carrier employed by the United States Postal Service (“USPS”) and was therefore a “public official” as defined by Title 18, United States Code, Section 201(a)(1).
4. Tanya Whyte-Francis worked as a postal carrier at the Levittown Post Office, located at 7200 New Falls Road in Levittown, Pennsylvania, and was responsible for delivering USPS packages to addresses along her assigned postal route.

5. As a postal carrier, Tanya Whyte-Francis owed the USPS the duty to, among other things: (a) ensure the security and integrity of the mail; (b) safeguard the mail against use by individuals and enterprises engaged in criminal activity, including trafficking in narcotics; (c) deliver the mail to the specified addressee; (d) handle undeliverable mail in accordance with USPS policies and regulations; and (e) correctly and accurately record the delivery of each USPS package sent via Priority Mail.

6. Tanya Whyte-Francis used her official position with USPS to support the illicit transportation and delivery of packages containing marijuana to defendant DEWHITE DAWKINS.

THE CONSPIRACY

7. From at least in or about February 2019 through on or about June 23, 2020, in Levittown, in the Eastern District of Pennsylvania, and elsewhere, defendant

**DEWHITE DAWKINS,
a/k/a “Twin White,”
a/k/a “Kaleem Fraites,”**

conspired and agreed, together and with Tanya Whyte-Francis and Person A, known to the United States Attorney, and others known and unknown to the United States Attorney, to commit offenses against the United States, that is, multiple acts of bribery of a public official with intent to influence an official act as defined in 18 U.S.C. § 201(a)(3) and to induce the public official to do an act or omit an act in violation of her official duty, in violation of 18 U.S.C. § 201(b)(1)(A) and (C).

MANNER AND MEANS

It was a part of the conspiracy that:

8. Defendant DEWHITE DAWKINS made arrangements with Tanya Whyte-Francis to intercept and deliver Priority Mail packages containing marijuana to defendant DAWKINS or Person A in return for cash or CashApp payments.

9. Tanya Whyte-Francis provided defendant DEWHITE DAWKINS with a list of addresses along her postal route to use as addresses on packages to be mailed to Levittown, Pennsylvania.

10. Defendant DEWHITE DAWKINS and other conspirators mailed and caused to be mailed packages containing marijuana via USPS from California, and addressed to defendant DAWKINS, Person A, and “Kaleem Fraites,” an alias of defendant DAWKINS, at addresses on Tanya Whyte-Francis’s postal route.

11. Defendant DEWHITE DAWKINS then alerted Tanya Whyte-Francis to the dates that the packages containing marijuana were scheduled to arrive at the Levittown Post Office.

12. After the packages arrived at the Levittown Post Office, Tanya Whyte-Francis met with DEWHITE DAWKINS or Person A at various locations on Whyte-Francis’s postal route, to deliver the packages to them.

13. Defendant DEWHITE DAWKINS and Person A paid cash either at the time of the delivery or made payment later via CashApp to Tanya Whyte-Francis in exchange for receiving the packages containing marijuana.

OVERT ACTS

In furtherance of the conspiracy, and to accomplish its objective, defendant DEWHITE DAWKINS, Tanya Whyte-Francis, and Person A, known to the United States Attorney, and others known and unknown to the United States Attorney, committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

1. On or about February 12, 2019, in California, a person unknown to the United States Attorney, placed in the U.S. mail two packages (USPS Tracking Numbers XX642679 and XXX710032) containing marijuana addressed to Person A at an address located along Tanya Whyte-Francis's postal route.

On or about February 15, 2019:

2. While on duty, Tanya Whyte-Francis met with Person A on the street along her postal route in Levittown and gave Person A the two packages (USPS Tracking Numbers XX642679 and XX710032) that contained marijuana.

3. Defendant DEWHITE DAWKINS made a payment via CashApp using his alias, "Kaleem Fraites," to Tanya Whyte-Francis in exchange for Whyte-Francis's delivery of the two packages containing marijuana.

4. On or about February 20, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX009389) addressed to Person A at an address located along Tanya Whyte-Francis's postal route.

On or about February 22, 2019:

5. While on duty, Tanya Whyte-Francis met with Person A on the street along her postal route and gave Person A the package (USPS Tracking Number XX009389) that contained marijuana.

6. Defendant DEWHITE DAWKINS , using his alias, “Kaleem Fraites, made a payment via CashApp to Tanya Whyte-Francis in exchange for Whyte-Francis’s delivery of the package containing marijuana.

7. On or about February 28, 2019, in California, a person unknown to the United States Attorney, placed in the U.S. mail two packages containing marijuana (USPS Tracking Numbers XX201798 and XX781142) addressed to defendant DEWHITE DAWKINS and “A Ringham,” respectively, at an address located along Tanya Whyte-Francis’s postal route.

On or about March 2, 2019:

8. While on duty, Tanya Whyte-Francis met with Person A in Levittown on the street along Whyte-Francis’s postal rout and gave him the two packages (USPS Tracking Number XX201798 and XX781142) that contained marijuana.

9. Person A gave Tanya Whyte-Francis cash in exchange for Whyte-Francis delivering the two packages that contained marijuana.

10. In California, a person unknown to the United States Attorney, placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX213018) addressed to Person A at an address located along Tanya Whyte-Francis’s postal route.

11. On or about March 5, 2019, while on duty, Tanya Whyte-Francis met with Person A in Levittown on the street along her postal route and gave him the package (USPS Tracking Number XX213018) that contained marijuana.

12. On or about August 7, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX210408) addressed to Person A at an address located along Tanya Whyte-Francis's postal route.

13. On or about August 10, 2019, while on duty, Tanya Whyte-Francis met with defendant DEWHITE DAWKINS in Levittown on the street along Whyte-Francis's postal route and gave defendant DAWKINS him the package (USPS Tracking Number XX210408) that contained marijuana.

14. On or about August 12, 2019, defendant DEWHITE DAWKINS made a payment via CashApp to Tanya Whyte-Francis in exchange for her delivering the package that contained marijuana.

15. On or about October 18, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail two packages (USPS Tracking Numbers XX324265 and XX324227) addressed to "K Fraites" at an address located along Tanya Whyte-Francis postal route.

16. On or about October 21, 2019, while on duty, Tanya Whyte-Francis met with Person A in Levittown on the street along Whyte-Francis's postal route and gave him the two packages (USPS Tracking Numbers XX324265 and XX324227) that contained marijuana.

17. On or about October 26, 2019, defendant DEWHITE DAWKINS made a payment via CashApp to Tanya Whyte-Francis in exchange for her delivering the two packages that contained marijuana.

18. On or about November 9, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail four packages (USPS Tracking Numbers XX046396, XX210731, XX209596, and XX703900) addressed to “K Fraites” at an address located along Tanya Whyte-Francis’ postal route.

19. On or about November 12, 2019, while on duty, Tanya Whyte-Francis met with Person A in Levittown on the street along her postal route and gave Person A the four packages (USPS Tracking Numbers XX06396, XX210731, XX209596, and XX703900) that contained marijuana.

20. On or about November 16, 2019, defendant DEWHITE DAWKINS made payments via CashApp to Tanya Whyte-Francis in exchange for her delivering the four packages that contained marijuana.

21. On or about November 30, 2019, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX816336) addressed to Person A at an address located along Tanya Whyte-Francis’s postal route.

On or about December 2, 2019:

22. While on duty, Tanya Whyte-Francis met with Person A in Levittown on the street along her postal route and gave Person A the package (USPS Tracking Number XX816336) that contained marijuana.

23. Person A gave Tanya Whyte-Francis cash in exchange for her delivering the package that contained marijuana.

24. On or about June 20, 2020, in California, a person unknown to the United States Attorney placed in the U.S. mail a package containing marijuana (USPS Tracking Number XX704645) addressed to Person A at an address located along Tanya Whyte-Francis's postal route.

25. On or about June 23, 2020, while on duty, Tanya Whyte-Francis met with Person A in Levittown on the street along her postal route and gave Person A the package (USPS Tracking Number XX704645) that contained marijuana.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. Paragraphs 1 through 6 and 8 through 13 of Count One are incorporated here.
2. On or about June 23, 2020, in Levittown, in the Eastern District of Pennsylvania, defendant

**DEWHITE DAWKINS,
a/k/a "Twin White,"
a/k/a "Kaleem Fraites,"**

directly and indirectly corruptly gave, offered, and promised a thing of value to Tanya Whyte-Francis, a public official, with intent to influence the performance of an official act, and with intent to induce Tanya Whyte-Francis to do and omit to do an act in violation of her official duties, that is, defendant DAWKINS gave, offered and promised Tanya Whyte-Francis cash in return for the diversion of a USPS package to Person A for the purpose of the distribution of marijuana contained within the package.

In violation of Title 18, United States Code, Sections 201(b)(1)(A) and (C) and 2.


DAVID METCALF
UNITED STATES ATTORNEY

No. _____

UNITED STATES DISTRICT COURT

Eastern District of Pennsylvania

Criminal Division

THE UNITED STATES OF AMERICA

vs.

DEWHITE DAWKINS
a/k/a “Twin White”
a/k/a “Kaleem Fraites”

INFORMATION

Counts

- 18 U.S.C. § 371 (conspiracy to commit bribery – 1 count)**
- 18 U.S.C. § 201 (bribery - 1 count)**
- 18 U.S.C. § 2 (aiding and abetting)**

A true bill.

Foreperson

Filed in open court this _____ day,
Of _____ A.D. 20 _____

Foreperson

Bail, \$ _____